

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	CHAPTER 11
	§	
FIELDWOOD ENERGY, LLC, <i>et al.</i> ¹	§	CASE NO. 20-33948 (MI)
	§	
DEBTORS.	§	JOINTLY ADMINISTERED

**NOTICE OF PERFECTION, CONTINUATION OR MAINTENANCE OF LIEN
PURSUANT TO 11 U.S.C. § 546(b)**

PLEASE TAKE NOTICE THAT **TETRA TECHNOLOGIES, INC.** (“Tetra”), creditor in the above-styled and numbered case, by and through undersigned counsel, hereby gives notice of its valid, timely filed, and properly perfected statutory mineral liens against **FIELDWOOD ENERGY, LLC’S** (the “Debtor”) interest in mineral properties as described herein, together with all hydrocarbons produced from the mineral properties, and proceeds of production, under the laws of the state of Texas hereby perfects, maintains, and continues the liens pursuant to 11 U.S.C. §§ 362(b)(3) and 546(b)(2). In support of this Notice, Tetra will show the following:

1. Tetra furnished labor, work, materials, services, equipment, tools, and machinery under contract with the Debtor in connection with oil and gas operations on real property owned or leased by the Debtor in Jefferson Parish, Louisiana, Mobile County, Alabama and Jackson County, Mississippi for which Tetra has not been fully paid. The principal amount due and owing to Tetra secured by the liens attached is **\$7,544,575.73**, exclusive of contractual interest, attorneys’

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

fees and costs. Tetra 's claim is secured by the statutory oil and gas liens as more particularly described below.

2. Tetra timely filed its Claim of Liens on Oil and Gas Wells & Pipelines (the “Liens”) which are described as follows:

Well/Tract/Parcel Name	Lien Amount	Recording Date	Recording Information
Submerged Lands Outer Continental Shelf Lands Act, <u>Serial No. OCS-G 27278</u>	\$3,314,642.27	8/17/2020	Mobile County, AL Doc. No. 2020049479
Submerged Lands Outer Continental Shelf Lands Act, <u>Serial No. OCS-G 345326</u>	\$3,331,356.30	8/17/2020	Jefferson Parish, LA Doc. No. 12038502
		8/17/2020	Plaquemines Parish, LA Doc. No. 2020-00003317
Submerged Lands Outer Continental Shelf Lands Act, <u>Serial No. OCS-G 28030</u>	\$898,577.16	8/28/2020	Jackson County, MS Doc. No. 202019099
Total	\$7,544,575.73		

Copies of the Liens filed by Tetra are attached as **Exhibit “A”** and incorporated herein by reference.

3. Tetra’s Liens attach to the whole of the oil and gas leasehold for which labor, materials and/or work and/or services were furnished by Tetra to the Debtor, including: all materials and fixtures owned by the owner or owners of such leasehold and used or employed, or furnished to be used or employed in the drilling or operating of any oil or gas well located thereon, and all oil and gas wells located on such leasehold, and the oil and gas produced therefrom, and

the proceeds thereof inuring to the working interest therein as such working interest existed on the date such labor was first performed or such materials or services were first furnished, including without limitation, those which are described in or provided for under the Liens.

4. Tetra intends to enforce its interests in the properties which are secured by the Liens.

5. Tetra further claims all rights concerning the tolling of applicable statutes of limitation.

6. Tetra gives notice that, to the extent it does not under applicable law already possess a perfected interest in the above-described properties, Tetra hereby perfects its interest pursuant to applicable provisions of the Bankruptcy Code, including but not limited to 11 U.S.C. §§ 362(b)(2) and 546(b)(3). This Notice is in lieu of seizure of property or commencement of an action to accomplish such perfection of Tetra's rights to the properties which are the subject of the Liens. By virtue of this notice and applicable law, Tetra demands adequate protection of its interest to the properties which is the subject of the Liens. Supplemental action to foreclose the Liens or other collection measures shall be authorized only by the Bankruptcy Court including, but not limited to, obtaining relief from the stay.

7. Tetra reserves the right to supplement and/or amend this Notice. Tetra further reserves all rights with respect to the Liens under applicable law, including but not limited to seeking relief from the stay.

WHEREFORE PREMISES CONSIDERED, please take notice that all proceeds of any sale of the properties securing the Liens constitutes cash collateral under 11 U.S.C. § 363(a) and may not be used unless each entity that has an interest in such cash collateral consents. Tetra does not consent to the use of its cash collateral.

DORÉ ROTHBERG MCKAY, P.C.

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Attorneys for TETRA Technologies, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served upon the following parties via electronic means through the Court's CM/ECF system on December 1, 2020.

/s/ Zachary S. McKay
Zachary S. McKay